

EXHIBIT A

From: [Wirtschafter, Carla M.](#)
To: rymirhere@gmail.com; lmcoley@comcast.net
Cc: [Kahn, Allison L.](#); [Siev, Jordan W.](#)
Subject: Meet and Confer - Central District of California Lawsuits, Case Nos. 2:25-cv4251 and 2:25-cv4216
Date: Wednesday, July 9, 2025 11:03:10 AM
Importance: High

Ms. Coley and Mr. Satterthwaite:

My colleague Allison Kahn and I just left a voicemail for Mr. Satterthwaite at 717-317-3571 (Mr. Satterthwaite) and spoke to Ms. Coley at 215-620-0278 before she hung up on us after refusing to meet and confer. As I explained in the voicemail I left for Mr. Satterthwaite and to Ms. Coley before she yelled at me and abruptly hung up, Ms. Kahn and I called in order to meet and confer with you pursuant to Local Rule 7-3 and Judge Garnett's Standing Order about the forthcoming motion we plan to file on behalf of Mr. Carter on July 18, 2025. Judge Garnett's Order, at Dkt. 21 (in Ms. Coley's lawsuit), footnote 1 states, "The Court also informs Plaintiff that communications between opposing attorneys about scheduling and other matters are proper, and that the parties should cooperate in good faith on future stipulated extensions of time. The Court also reminds the parties to comply with the Court's standing orders." Ms. Coley's demand that we not call and send an email is directly in conflict with Judge Garnett's standing order which states, " Parties must meet and confer either by videoconference or in person. Email correspondence is insufficient."

In a continued effort to comply with our meet and confer obligations, we ask that you both please return our call or send an email indicating when you are available to meet and confer by phone or zoom. As we explained in our voicemail to Mr. Satterthwaite and attempted to explain to Ms. Coley before she hung up on us, we intend to move to dismiss each of your respective complaints on the following grounds:

Ground 1: insufficient service of process of complaint pursuant to Federal Rule of Civil Procedure Rule 12(b)(5). Mr. Carter has not been properly served under the law. Mail service is not a valid method of service under CA law and there has been no substitute service because a copy of the summons and complaint was never left with a responsible adult at Defendants' home or workplace and nor is there evidence that copies were mailed to the same address.

Ground 2: lack of subject-matter jurisdiction pursuant to Federal Rule of Civil Procedure Rule 12(b)(1). Each claim is barred by the Rooker-Feldman Doctrine because they seek to challenge state court orders.

Ground 3: violation of California Code of Civil Procedure 425.16 because (1) each claim arises from prior litigation conduct which is protected activity under CCP 425.16 and (2) no reasonable probability of prevailing on the claims because they are legally barred. With respect to the second point, they claims are barred on the following grounds:

- Deceit claim
 - o Barred by litigation privilege
 - o Barred by statute of limitations
 - o Complaint concedes Plaintiffs knew and had evidence of the fact they allege was concealed, and therefore, cannot establish an essential element of this claim.
- Abuse of Process
 - o Barred by litigation privilege
 - o Barred by statute of limitations
 - o There are no allegations of misuse of the tools of litigation otherwise available in the "regular conduct" of court proceedings.
- Intentional Infliction of Emotional Distress/Negligent Infliction of Emotional Distress
 - o Barred by litigation privilege
 - o Barred by statute of limitations
 - o Failure to adequately plead extreme and outrageous conduct or actionable emotional distress

- Unjust enrichment
 - o Not a claim under CA law
 - o No allegations of a benefit conferred upon Defendant.

Please also note that we intend to request attorney's fees and costs pursuant to CCP 425.16.

Ground 4: failure to state a valid claim pursuant to Federal Rule of Civil Procedure Rule 12(b)(6). The basis for this motion is the same as what is identified above as the legal deficiencies of each claim.

Please let us know when you are available to confer in compliance with the Court's rules. Please also let us know if you are willing to dismiss your respective complaints or any claim pled in light of the foregoing.

Regards,

Carla

Carla M. Wirtschafter

+1 310 734 5253

cwirtschafter@reedsmith.com

ReedSmith LLP

1901 Avenue of the Stars, Suite 700, Los Angeles, CA 90067

Telephone: +1 310 734 5200 Fax: +1 310 734 5299

Please consider the environment before printing the contents of this email.

From: [Wirtschafter, Carla M.](#)
To: rymirhere@gmail.com; lmcoley@comcast.net
Cc: [Kahn, Allison L.](#); [Siev, Jordan W.](#)
Subject: RE: Meet and Confer - Central District of California Lawsuits, Case Nos. 2:25-cv4251 and 2:25-cv4216
Date: Thursday, July 10, 2025 1:32:41 PM

Ms. Coley and Mr. Satterthwaite:

I am following up on the below. Please promptly respond so they we can comply with the court's meet and confer requirements.

Carla

Carla M. Wirtschafter

+1 310 734 5253

cwirtschafter@reedsmith.com

ReedSmith LLP

1901 Avenue of the Stars, Suite 700, Los Angeles, CA 90067

Telephone: +1 310 734 5200 Fax: +1 310 734 5299

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Sent: Wednesday, July 9, 2025 11:03 AM
To: rymirhere@gmail.com; lmcoley@comcast.net
Cc: Kahn, Allison L. <AKahn@reedsmith.com>; Siev, Jordan W. <JSiev@ReedSmith.com>
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Regards,

Carla

Carla M. Wirtschafter

+1 310 734 5253

cwirtschafter@reedsmith.com

ReedSmith LLP

1901 Avenue of the Stars, Suite 700, Los Angeles, CA 90067

Telephone: +1 310 734 5200 Fax: +1 310 734 5299

Please consider the environment before printing the contents of this email.

From: [Wirtschafter, Carla M.](#)
To: [Kahn, Allison L.](#)
Subject: FW: Matter of Lillie Coley - 2:25-cv4216
Date: Thursday, July 10, 2025 2:10:44 PM

Carla M. Wirtschafter

[+1 310 734 5253](#)

cwirtschafter@reedsmith.com

ReedSmith LLP

1901 Avenue of the Stars, Suite 700, Los Angeles, CA 90067

Telephone: [+1 310 734 5200](#) Fax: [+1 310 734 5299](#)

Please consider the environment before printing the contents of this email.

From: LILLIE COLEY <lmcoley@comcast.net>
Sent: Thursday, July 10, 2025 2:10 PM
To: Wirtschafter, Carla M. <CWirtschafter@ReedSmith.com>
Subject: Matter of Lillie Coley - 2:25-cv4216

External E-Mail - FROM lmcoley@comcast.net <lmcoley@comcast.net>

Hello,

I will have an update to you tomorrow regarding the Meet and Confer.

Thanks

From: [Wirtschafter, Carla M.](#)
To: [Kahn, Allison L.](#)
Subject: FW: Matter of Lillie Coley - 2:25-cv4216
Date: Friday, July 11, 2025 1:15:41 PM

Carla M. Wirtschafter

[+1 310 734 5253](#)

cwirtschafter@reedsmith.com

ReedSmith LLP

1901 Avenue of the Stars, Suite 700, Los Angeles, CA 90067

Telephone: +1 310 734 5200 Fax: +1 310 734 5299

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From: LILLIE COLEY <lmcoley@comcast.net>
Sent: Friday, July 11, 2025 1:15 PM
To: Wirtschafter, Carla M. <CWirtschafter@ReedSmith.com>
Subject: Re: Matter of Lillie Coley - 2:25-cv4216

External E-Mail - FROM lmcoley@comcast.net <lmcoley@comcast.net>

—
Hello,

I am getting legal advise on the information you sent and is not prepared right now for the Meet and Confer, but you will contact you before the end of next week to schedule the conference.

Thanks

On 07/10/2025 5:10 PM EDT LILLIE COLEY <lmcoley@comcast.net> wrote:

Hello,

I will have an update to you tomorrow regarding the Meet and Confer.

Thanks

From: [Wirtschafter, Carla M.](#)
To: [LILLIE COLEY](#); rymirhere@gmail.com
Cc: [Kahn, Allison L.](#); [Siev, Jordan W.](#)
Subject: Meet and Confer - Central District of California Lawsuits, Case Nos. 2:25-cv4251 and 2:25-cv4216
Date: Friday, July 11, 2025 1:36:04 PM
Attachments: [RE Meet and Confer - Central District of California Lawsuits Case Nos. 225-cv4251 and 225-cv4216.msg](#)

Hi Ms. Coley and Mr. Satterthwaite:

Ms. Coley – your below email does not indicate if you are continuing to act in pro per or if you have retained legal counsel to represent you this lawsuit. Please confirm if you have retained legal counsel and identify your counsel. As I explained when we spoke on Wednesday and in my follow up email attached, Judge Garnett requires the parties to confer by zoom or in person. Email is not sufficient. The conferral deadline is today and we are filing our motion next Friday. Because you filed your lawsuit pro per, we are required to confer with you directly unless you have retained legal counsel in this lawsuit. If you have retained legal counsel to represent you in your lawsuit please advise who that is and forward this email (with the attachment) to your counsel and ask your counsel to contact me as soon as possible today about conferring.

Mr. Satterthwaite - Ms. Kahn and I just called you at 717-317-3571. The call connected but was disconnected immediately after we identified ourselves. When we called a second time, it went directly to voicemail and we left you a message following up on our prior attempts to confer as required by the Court's rules.

In compliance with Judge Garnett's rules and Local Rule 7-3, we again ask that you each return our calls or respond to our emails indicating a date and time that you are available to confer by zoom. We will be filing our Motions next Friday, July 18, which will detail our attempts to confer with you in compliance with the Court's rules.

Carla

Carla M. Wirtschafter

+1 310 734 5253

cwirtschafter@reedsmith.com

ReedSmith LLP

1901 Avenue of the Stars, Suite 700, Los Angeles, CA 90067

Telephone: +1 310 734 5200 Fax: +1 310 734 5299

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From: LILLIE COLEY <lmcoley@comcast.net>
Sent: Friday, July 11, 2025 1:15 PM
To: Wirtschafter, Carla M. <CWirtschafter@ReedSmith.com>
Subject: Re: Matter of Lillie Coley - 2:25-cv4216

External E-Mail - FROM lmcoley@comcast.net <lmcoley@comcast.net>

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I am getting legal advise on the information you sent and is not prepared right now for the Meet and Confer, but you will contact you before the end of next week to schedule the conference.

Thanks

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Hello,

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Thanks

From: [Wirtschafter, Carla M.](#)
To: [LILLIE COLEY](#); rymirhere@gmail.com
Cc: [Kahn, Allison L.](#); [Siev, Jordan W.](#)
Subject: Meet and Confer - Central District of California Lawsuits, Case Nos. 2:25-cv4251 and 2:25-cv4216
Date: Monday, July 14, 2025 12:00:51 PM
Attachments: [Meet and Confer - Central District of California Lawsuits Case Nos. 225-cv4251 and 225-cv4216.msg](#)
[RE Meet and Confer - Central District of California Lawsuits Case Nos. 225-cv4251 and 225-cv4216.msg](#)

Ms. Coley:

As I previously advised you the Court's rules require a video or in person conference so phone is not sufficient. We are available for a zoom conference on Thursday, July 17 at your requested time of 4 pm PST. Please send a zoom invite or advise if you want us to send one.

Mr. Satterthwaite – we follow up again on our attempts to confer with you which have been met with silence to date. Please join the July 17 conference or respond to our emails and voicemails to advise when you are available.

Regards,
Carla

Carla M. Wirtschafter
[+1 310 734 5253](tel:+13107345253)
cwirtschafter@reedsmith.com

ReedSmith LLP
1901 Avenue of the Stars, Suite 700, Los Angeles, CA 90067
Telephone: +1 310 734 5200 Fax: +1 310 734 5299
Please consider the environment before printing the contents of this email.

From: LILLIE COLEY <lmcoley@comcast.net>
Sent: Monday, July 14, 2025 11:44 AM
To: Wirtschafter, Carla M. <CWirtschafter@ReedSmith.com>
Subject: Matter of Lillie Coley - 2:25-cv4216Meet and Confer

External E-Mail - FROM lmcoley@comcast.net <lmcoley@comcast.net>

Hello Carla,

I am writing regarding the meet and confer, can we meet on Thursday, July 17, 2025 @4pm PT for a phone meeting?

As of today the pending attorney is not completed, if the transaction is done by Thursday they will attend the meeting. If not, I will proceed as pro se. Let me know if you have questions. If you need to talk before then please let me know so I can be somewhere prepared for your call.

Thanks

Lillie Coley
215 620 0278

From:
To:
Subject:
Date:

Wirtschafter, Carla M.
[Kahn, Allison L.](#)
Fw: Matter of Lillie Coley - 2:25-cv4216Meet and Confer
Wednesday, July 16, 2025 10:45:18 PM

Carla M. Wirtschafter

+1 310 734 5253

CWirtschafter@reedsmith.com

ReedSmith LLP

1901 Avenue of the Stars, Suite 700, Los Angeles, CA 90067
Telephone: +1 310 734 5200 Fax: +1 310 734 5299

Please consider the environment before printing the contents of this email.

From: LILLIE COLEY <lmcoley@comcast.net>

Sent: Wednesday, July 16, 2025 6:44:42 AM

To: Wirtschafter, Carla M. <CWirtschafter@ReedSmith.com>

Subject: Re: Matter of Lillie Coley - 2:25-cv4216Meet and Confer

External E-Mail - FROM lmcoley@comcast.net <lmcoley@comcast.net>



Hello,

You can send the Zoom link for the conference tomorrow at 4pm PST. Thanks

On 07/14/2025 8:46 PM EDT LILLIE COLEY <lmcoley@comcast.net> wrote:

Ok a videoconference is fine. Thanks

On 07/14/2025 2:44 PM EDT LILLIE COLEY

<lmcoley@comcast.net> wrote:

Hello Carla,

I am writing regarding the meet and confer, can we meet on

Thursday, July 17, 2025 @4pm PT for a phone meeting?

As of today the pending attorney is not completed, if the

transaction is done by Thursday they will attend the meeting. If

not, I will proceed as pro se. Let me know if you have

questions. If you need to talk before then please let me know

so I can be somewhere prepared for your call.

Thanks

Lillie Coley

215 620 0278

Subject: Meet and Confer - Central District of California Lawsuits, Case Nos. 2:25-cv4251 and 2:25-cv4216

Location: <https://reedsmith.zoom.us/j/91611418986?pwd=bleIMP7gClyZ5FTtpa2s689odEVokn.1&from=addon>

Start: Thu 7/17/2025 4:00 PM

End: Thu 7/17/2025 4:30 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Kahn, Allison L.

Required Attendees: Wirtschafter, Carla M.; Imcoley@comcast.net; rymirhere@gmail.com

Kahn, Allison L. is inviting you to a scheduled Zoom meeting

Join Zoom Meeting

<https://reedsmith.zoom.us/j/91611418986?pwd=bleIMP7gClyZ5FTtpa2s689odEVokn.1&from=addon>

Meeting ID: 916 1141 8986

Passcode: 498484

IMPORTANT: Please do not reuse the meeting URL other than during the specific meeting time.

One tap mobile - tap the number next to your location below to dial into your meeting (audio only):

Belgium: +3227924508,,91611418986#,,, *498484#

China (North & South): one tap dialing currently unavailable in China

France: +33170394855,,91611418986#,,, *498484#

Germany: +4969710448211,,91611418986#,,, *498484#

Greece: +302111984724,,91611418986#,,, *498484#

Hong Kong: +85230508681,,91611418986#,,, *498484#

Kazakhstan: 88003337575,,91611418986#,,, *498484#

Singapore: +6565792517,,91611418986#,,, *498484#

UAE: 800035703125,,91611418986#,,, *498484#

UK: +442079791833,,91611418986#,,, *498484#

US: +16462551997,,91611418986#,,, *498484#

US: +14042012656,,91611418986#,,, *498484#

To join a Reed Smith Zoom meeting from an office desk phone, dial x2223 or manually dial by your location:

Belgium: +32 2 792 4508

China (North & South): +86 400 842 3846

France: +33 1 7039 4855

Germany: +49 69 7104 48211

Greece: +30 211 198 4724

Hong Kong: +85 2 3050 8681

Kazakhstan: 8800 3337575

Singapore: +65 6579 2517

UAE: 800 0357 03125

UK: +44 207 979 1833

US: +1 404 201 2656

US: +1 212 225 8997

US +1 646 255 1997

US Toll-Free +1 877 312 6016

Find your local number or International Toll Numbers: <https://bit.ly/48JtwwZ>

Additional methods of joining:

Information to join by SIP or H.323 can be provided by contacting the Reed Smith IT Help Desk.